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Brian Armstrong, Alesia J. Haas,
Emilie Choi, Paul Grewal, Jennifer N. Jones,
Marc L. Andreessen, Frederick Ernest Ehram III,
Kathryn Haun, Kelly Kramer, Gokul Rajaram,
and Fred Wilson*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE COINBASE GLOBAL, INC.,
SECURITIES LITIGATION

No. 2:22-cv-04915-BRM-LDW

**STIPULATION AND
[PROPOSED] CONSENT
ORDER SETTING DEADLINE
TO ANSWER THE SECOND
AMENDED COMPLAINT**

Hon. Brian R. Martinotti

Defendants Coinbase Global, Inc. (“Coinbase”), Brian Armstrong, Alesia J. Haas, Emilie Choi, Paul Grewal, Jennifer N. Jones, Marc L. Andreessen, Frederick Ernest Ehrsam III, Kathryn Haun, Kelly Kramer, Gokul Rajaram, and Fred Wilson (collectively, “Defendants”) and Lead Plaintiff Sjunde AP-Fonden and Additional Plaintiffs Ryan R. Firth and Zvia Steinmetz (“Plaintiffs,” and together with Defendants, the “Parties”) by and through their respective undersigned counsel, hereby submit this joint stipulation and proposed Consent Order setting a deadline for Defendants to answer the Second Amended Complaint. In support, the Parties represent that:

1. On September 5, 2024, the Court issued an order granting in part and denying in part Defendants’ Motion to Dismiss the Second Amended Complaint and giving Plaintiffs the option to file a Third Amended Complaint within 30 days, or by October 7, 2024, Dkt. 85;

2. In recognition of the possibility that Plaintiffs could file a Third Amended Complaint by the October 7, 2024 deadline, the Parties stipulated to vacate Defendants’ original September 19, 2024 deadline to answer the Second Amended Complaint and submit a proposed schedule by October 14 for Defendants to either answer the Second Amended Complaint or respond to a potential Third Amended Complaint;

3. On September 17, the Court entered an Order approving the Parties' stipulation;

4. On September 19, Defendants filed a Motion for Reconsideration of the Court's September 5 Order on the Motion to Dismiss;

5. On October 4, Plaintiffs informed Defendants that they did not plan to file a Third Amended Complaint;

6. On October 7, counsel for the Parties conferred by telephone regarding the timing for the Answer and an initial discovery conference, and the Parties conferred further via email on subsequent days;

7. The Motion for Reconsideration has the potential to substantially affect the scope of the allegations in the Second Amended Complaint;

8. In light of the uncertainty created by the Motion for Reconsideration and the length and complexity of the Second Amended Complaint, the Parties have agreed that Defendants shall file an Answer to the Second Amended Complaint by the later of January 15, 2025, or sixty days after the Court enters an order on the Motion for Reconsideration, with an initial discovery conference to be held thereafter pursuant to Local Rule 16.1(a);

9. The joint stipulation is submitted in good faith, and not to cause undue or unwarranted delay of the proceeding.

WHEREFORE, the Parties respectfully request that the Court issue an order (i) directing Defendants to file an Answer to the Second Amended Complaint by the later of January 15, 2025, or sixty days after the Court enters an order on the Motion for Reconsideration, and (ii) setting an initial discovery conference pursuant to Local Rule 16.1(a) for a date thereafter that is convenient for the Court.

Dated: October 14, 2024

Respectfully submitted,
LATHAM & WATKINS LLP

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Dated: October 14, 2024

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SO ORDERED:

_____, 2024

THE HON. BRIAN R. MARTINOTTI
UNITED STATES DISTRICT JUDGE